

REMARKS

This Amendment is in response to the Office action mailed on 3 March 2004 (Paper No. 200402220).

STATUS OF THE CLAIMS

The specification has been amended to correct minor errors and improve form. Claims 1, 2 and 4 and 11 through 14 have been canceled without prejudice or disclaimer of their subject matter, claims 3, 5, 6, 8, 10 and 15 through 20 have been amended, and claims 21 through 32 have been newly added.

Claim Rejections under 35 U.S.C. § 102

Claims 11 through 12 and 20 are rejected under 35 U.S.C. § 102(e) for alleged anticipation by Sasai *et al.*, U.S. Patent No. 6,426,803. This rejection is rendered moot by the cancellation of claims 11 and 12, and by the broadened scope of claim 20 by the foregoing amendment.

Claim Rejections under 35 U.S.C. § 103

Claims 13 and 14

Claims 13 and 14 are rejected under 35 U.S.C. § 103(a) for alleged unpatentability over Sasai *et al.* '803. This rejection is rendered moot by the cancellation of claims 13 and 14.

Claims 1 through 4 and 10

Claims 1 through 4 and 10 are rejected under 35 U.S.C. § 103(a) for alleged unpatentability over Sasai *et al.* '803. This rejection is rendered moot by the cancellation of claims 1, 2 and 4, and the broadening amendment of claim 10 to depend upon newly added independent claim 21.

Newly Presented Claim 21 through 32

Applicant newly presents independent claims 21, 25 and 29 to very broadly define the several embodiments of Applicant's inventions disclosed. These claims are readily distinguishable over the prior art. Applicant notes that claims 21, 25 and 29 use the technically accurate noun "bezel" in lieu of "front cover" throughout. Sasai *et al.* '803 teaches a "lower cover 100" and an "upper cover 200" with "holes 185a" and "triangular pawl 202". Liquid crystal display panel 11, shown in Figure 1, has nothing to do with either lower cover 100 or with upper cover 200. In fact, liquid crystal display 11 is an integral component part of scanner 300, a discrete assembly that is distinct from "lower cover 100" as well as from "upper cover 200". In contradistinction, the newly presented claims, and independent claim 21, 25 and 29 define, *inter alia*, a relation between "a panel bearing a screen" and a bezel and a rear cover encasing the panel.¹ Sasai *et al.* '803 is singularly devoid of any teaching for mounting liquid crystal display 11 within a bezel removably mating with either lower cover 100 of Sasai *et al.* '803 or with Applicant's rear cover. Absent disclosure of each and every feature of the pending claims 21, 25 and

¹ Claim 21, lines 2 and 5; Claim 25, lines 2 and 4; and Claim 29, lines 2,3, 10 and 11.

² See specifically, the back of disclosure attendant to the presence of LCD 342 in Figure 13 of Sasai *et al.* '803.

29, there is neither anticipation nor a *prima facie* showing of obviousness. Accordingly, newly presented claims 22 through 32 are patentably distinguishable and readily allowable over the prior art. Allowance of these claims is respectfully requested.

Applicant's specification broadly discloses both LCD and CRT embodiments. The pending claims cover both LCD, CRT and PDP visual displays, and thereby broadly define Applicant's contribution to the art.

Applicant notes that in support of one application of the Sasai *et al.* '803 reference, the Examiner argued that:

it has been held that mere rearranging [*sic*, "of the?"] parts of an invention involves only routine skill in the art."

Applicant respectfully disagrees, and notes that this assertion fails to satisfy the requirement for completeness mandated by 37 CFR §1.104(a), (b) and (c). Moreover, the Examiner's reliance upon this assertion is misplaced because Sasai *et al.* '803 fails to either teach or suggest *how* to rearrange those parts in order to provide Applicant's structure and assembly process with a "rear cover mating with said bezel" that frames the screen of the panel, and fails to either teach or suggest *where* to place which parts in order to obtain Applicant's structure and process. In short, there is no basis for making the Examiner's proposed modifications of Sasai *et al.* '803 except through an impermissible hindsight reconstruction of Sasai *et al.* '803 in the very light provided alone by Applicant's teachings.


Furthermore, relocation of the various parts of Sasai *et al.* '803 toward LCD 11 in Figure 1 of Sasai *et al.* '803 would impermissibly prevent Sasai *et al.* '803 from being

used in its intended mode of operation with "holes 185a" and "triangular pawl 202" assisting in the engagement of "lower cover 100" and "upper cover 200." This is, by itself, convincing indicia of non-obviousness. Further reliance upon Sasai *et al.* '803 to support a rejection of any of the pending claims is therefore, unwarranted.

In view of the above, it is submitted that the claims of this application are in condition for allowance, and early issuance thereof is solicited. Should any questions remain unresolved, the Examiner is requested to telephone Applicant's attorney.

A fee of \$90.00 is incurred by the addition of five (5) total claims in excess of total 20. Applicant's check drawn to the order of Commissioner accompanies this Amendment. Should the check become lost, be deficient in payment, or should other fees be incurred, the Commissioner is authorized to charge Deposit Account No. 02-4943 of Applicant's undersigned attorney in the amount of such fees.

Respectfully submitted,


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